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**ATTORNEYS FOR SOCIETY HILL AT HAMILTON II CONDOMINIUM  
ASSOCIATION, INC.**

In re:

**DENA BONFONTI,**

Debtor.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
IN PROCEEDINGS UNDER CHAPTER 13  
OF THE BANKRUPTCY CODE

CASE NO.: **18-20299-MBK**

**OBJECTION TO CONFIRMATION OF  
DEBTOR'S MODIFIED  
CHAPTER 13 PLAN**

Creditor, Society Hill at Hamilton II Condominium Association, Inc. (the "Association"), by and through its counsel, McGovern Legal Services, LLC, hereby submits this objection to Debtor's plan of reorganization under Chapter 13 of the Bankruptcy Code. The Association's objection includes, but is not limited to the following:

**I. THE PROPOSED PLAN DOES NOT INCLUDE PAYMENT OF THE  
ASSOCIATION'S ENTIRE SECURED CLAIM.**

Debtor's modified Chapter 13 Plan fails to properly identify and treat the Association's entire \$9,277.92 secured claim. The Association's proof of claim was timely filed on June 19, 2018. Upon information and belief, this lien secures the Association's claim against the Debtor's principal residence.

The Debtor's modified Chapter 13 plan does not propose to pay the Association its entire \$9,277.92 secured claim. Pursuant to 11 U.S.C. §1322(b)(2), the Chapter 13 Plan may "modify

the rights of holders of secured claims, other than a claim secured only by a security interest in real property that is the debtor's principal residence" (emphasis added). As a result, the Association objects to confirmation of Debtor's Plan since it does not provide for payment of the entire secured claim and the Lien is filed against the Debtor's principal residence.

In addition, the Debtor's modified Chapter 13 plan does not accurately identify the full \$297.53 amount of post-petition monthly obligations to be paid outside of the plan. The Debtor's proposed Chapter 13 plan does not accurately reflect the total amounts due to the Association. Therefore, the Association objects to confirmation of the Debtor's Plan.

Respectfully submitted,  
McGovern Legal Services, LLC

Date: July 17, 2018

By: /s/Joseph Clemente  
JOSEPH CLEMENTE, ESQ.

**CERTIFICATION OF SERVICE**

I, Joseph Clemente, Esq., certify and state that this document was served upon the individuals and/or entities listed below by electronic mail on July 17, 2018. I am aware that if any of the statements made herein are willfully false, I am subject to punishment.

McGovern Legal Services, LLC

Date: July 17, 2018

By: /s/Joseph Clemente  
JOSEPH CLEMENTE, ESQ.

**SERVICE LIST**

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